

EXHIBIT 2

Sandra R. Vogel

From: Justin A. Redd
Sent: Thursday, December 2, 2021 10:47 AM
To: 'Stephen Stern'
Cc: David B. Irwin; 'spatterson@marcusbonsib.com'; 'Bruce L. Marcus'; 'Gregory Jordan'
Subject: RE: Activity in Case 1:21-cv-00309-ELH Boshea v. Compass Marketing, Inc. Reply to Response to Motion

Follow Up Flag: Copied to Worldox (Client Files\21337\0\03884087.MSG)

Stephen,

Thanks for discussing yesterday the issues in Compass's reply (ECF 71) that I raised below, including confirming that your office did receive the native format email. As I mentioned, the disputed email was produced well in advance of the filing of the reply, and the emails attached to Michael White's opposition reflect many proposed deposition dates. The contempt motion is obviously a serious matter, and the current briefing contains inaccurate information about my conduct. Please promptly file an appropriate supplement or correction to those issues.

Also, you mentioned some cases that you thought supported your position as to certain disputed questions and instructions not to answer in Michael White's deposition. You mentioned one called Hanlon, I believe. Please, as you offered, send the citations so I can review them and determine if the dispute can be resolved. I believe my position is correct and the objections and instructions were well-founded, but to the extent those cases may provide information I wasn't aware of, I am open to considering it. Thanks,

Justin A. Redd

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From: Justin A. Redd
Sent: Monday, November 29, 2021 3:12 PM
To: Stephen Stern <Stern@kaganstern.com>
Cc: David B. Irwin <dirwin@kg-law.com>; spaterson@marcusbonsib.com; Bruce L. Marcus <bmarcus@marcusbonsib.com>; Gregory Jordan <gjordan@jz-llc.com>
Subject: FW: Activity in Case 1:21-cv-00309-ELH Boshea v. Compass Marketing, Inc. Reply to Response to Motion

Stephen,

Please tell me the basis for the statements in Compass's reply (ECF 71 at 8) that only one deposition date was offered for Michael White — when in reality, we offered many — and (ECF 71 at 8 n.14) that "Compass Marketing has inquired about the status of Michael White's response to that subpoena and has been advised by Michael White's counsel that it is in the process of being delivered, but it has not been received yet." — when in reality, we already produced the native format email on 11/18.

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From: MDD_CM-ECF_Filing@mdd.uscourts.gov <MDD_CM-ECF_Filing@mdd.uscourts.gov>

Sent: Wednesday, November 24, 2021 12:37 PM

To: MDDdb_ECF@mdd.uscourts.gov

Subject: Activity in Case 1:21-cv-00309-ELH Boshea v. Compass Marketing, Inc. Reply to Response to Motion

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

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U.S. District Court

District of Maryland

Notice of Electronic Filing

The following transaction was entered by Stern, Stephen on 11/24/2021 at 12:37 PM EST and filed on 11/24/2021

Case Name: Boshea v. Compass Marketing, Inc.

Case Number: [1:21-cv-00309-ELH](#)

Filer: Compass Marketing, Inc.

Document Number: [71](#)

Docket Text:

REPLY to Response to Motion re [64] MOTION for Sanctions filed by Compass Marketing, Inc.. (Attachments: # (1) Exhibit, # (2) Exhibit, # (3) Exhibit, # (4) Exhibit, # (5) Exhibit, # (6) Exhibit, # (7) Exhibit, # (8) Exhibit, # (9) Exhibit, # (10) Exhibit, # (11) Exhibit)(Stern, Stephen)

1:21-cv-00309-ELH Notice has been electronically mailed to:

Bruce L Marcus bmarcus@marcusbonsib.com

David B Hamilton david.hamilton@wbd-us.com

Gregory J Jordan gjordan@jz-llc.com

Justin Akihiko Redd jredd@kg-law.com, svogel@kg-law.com

Sarah E Meyer sarah.meyer@wbd-us.com, laura.coulbourne@wbd-us.com

Stephen B Stern stern@kaganstern.com, ellis@kaganstern.com, yeung@kaganstern.com

Thomas J Gagliardo tgagliardo-efile@gelawyer.com, dbinder@gelawyer.com, incoming@gelawyer.com, Jhill@gelawyer.com, tomgagliardo@gmail.com

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The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1046883720 [Date=11/24/2021] [FileNumber=10452094-0] [08a83f7f1140274cc9195896b7751faa78c9726759e85aa8dd6a57f1015292165016a3c315f7a979aa8838482f7baab7185e056de3ef3ccdeb72e0862f2dfe1d]]

Document description:Exhibit

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1046883720 [Date=11/24/2021] [FileNumber=10452094-1] [70d3cf758ffad9c6be74ab332990c13afcf8a2356515f74996df72a4ac66622e8473df7658681ba85cb582f3c6c5a380513099e14a8654ec39f8a613e05dde37]]

Document description:Exhibit

Original filename:n/a

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Document description:Exhibit

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1046883720 [Date=11/24/2021] [FileNumber=10452094-3] [64dfc58960e642c0119a4234481a32bf32dc62fc4328d0034548c89998c34844192d0e5cd00c8413281e8b96a665a8a8ec01cfed785235a5aa1824f6267d4845]]

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Original filename:n/a

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Original filename:n/a

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Document description:Exhibit

Original filename:n/a

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[STAMP dcecfStamp_ID=1046883720 [Date=11/24/2021] [FileNumber=10452094-6] [349300eab3f7408ed20cd8a28f84815f83924d1ed207c2e5ee93c2e1defcfbe0b02920322c56cb9e21ec20dfc5dd4c6189c15588b820cab2fb5e38e198d178d5]]

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Original filename:n/a

Electronic document Stamp:

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Original filename:n/a

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Document description:Exhibit

Original filename:n/a

Electronic document Stamp:

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Document description:Exhibit

Original filename:n/a

Electronic document Stamp:

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